



## CENTRAL HIGH SCHOOL

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Received & Inspected  
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FCC Mail Room



9 January 2015

EX PARTE OR LATE FILED

Dear FCC,

Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
c/o Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

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**Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166  
via Electronic Filing**

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, O'Rielly and Ms. Dortch,

On behalf of Central High School, Brooksville, Florida, I write with concern about protection for our wireless microphones and backstage communications devices. We are a member of the Educational Theatre Association (EdTA), the national voice of theatre education that includes more than 5,000 educators and 90,000 student members. The mission of EdTA is to provide theatre education opportunities for all students. In addition, our school uses our systems for performances by our music department and our nationally acclaimed NJROTC program (ranking 1<sup>st</sup> or 2<sup>nd</sup> nationally in 7 of the last 10 years).

Central High School presents 10-12 public performances a year, with more than 10,000 attendees annually. Our school theatre program relies on the revenue generated in its performances to sustain and grow our in- and after-school theatre education opportunities for all of our 1180 students. Wireless microphones are a fundamental aspect of our program, and understanding how to use them a critical component of our educational pedagogy, both for student performers and technicians.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is

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seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my school and thousands of others without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you are unaware of them.

Thousands of performances are held by both educational and professional performing arts organizations each year and the use of wireless microphones is essential to producing high-quality performances and also mitigates against significant public safety concerns.

Per the FCC's request for Public Comment, here are the details about our school's use of wireless devices:

- The types of devices we use are:
  - Wireless hand held microphones for performance
  - Wireless lavalier microphones for performance
  - Cue and control communication devices
  - Equipment controlling devices (not transmitting sound)
- For any given production we may employ from 1 to 14 devices
- In the course of the school year we have two to four major productions for drama and music and from 15-20 other events in which our wireless devices may be used to a lesser extent.
- We use the following frequency bands for our devices:
  - VHF (channels 2-13, 54 MHz to 216 MHz)
  - Low UHF (channels 14-36, 470 to 608 MHz)
  - Some of our devices are frequency agile and able to select from a number of frequencies within a group. Most of our devices share capability within a band of 20 frequencies.
- We have both digital and analog devices:
  - Our wireless lavalier microphones are digital
  - Our hand held microphones and our cue and control devices are analog
- We own our own equipment but are contemplating having to rent for larger productions
- Some of the equipment we own has a useful life expectancy of 10 years.
- When the last rule change occurred we had to scrap our entire wireless microphone system
  - Replacement costs exceeded \$3000.00
  - We are still in the process of trying to obtain devices to replace what we had to give up as budget money is scarce and we cannot make the move quickly.
- It is a hardship for the FCC to mandate changes that cause a great expense to the public schools when budgets are so tight. It would seem appropriate for schools to be reimbursed for the cost of upgrading for the sake of compliance.
- FCC mandate ineffectiveness because of interference to us would be required for us to move to other frequencies at this point. We could not afford to make the move for the sake of convenience or "staying current."



I appreciate that the Commission has sought comment on these very important issues. I realize that the FCC is seeking a fair and reasonable solution to the TV band issues we are now facing, but that solution should allow *all* organizations—big and small, professional and educational—that some sort of interference protection. The currently proposed plan offers no such protection for many of us. Further, I would request that the Commission consider the burden already borne by the educational and performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my school's sound equipment.

Theatre education programs are cornerstones of many schools cultural identity, nurturing 21<sup>st</sup>-century skills and knowledge for students and providing pride, entertainment, and dialogue in the communities, and contribute to the local economies. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse educational and performing arts organizations for the cost of new equipment prompted by any proposed spectrum move.

Sincerely,

A handwritten signature in cursive script, reading "Leonard W. Budd". The signature is written in dark ink and is positioned above the printed name.

Leonard W. Budd  
Language and Theater Arts Teacher